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6 Attorney for Charles Winston James

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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12 v.  
13 CHARLES WINSTON JAMES,  
14 Defendant.

Case No. 2:21-MJ-0241-NJK

**STIPULATION TO CONTINUE  
PRELIMINARY HEARING**  
(Fourth Request)

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16 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,  
17 Acting United States Attorney, and Jared Grimmer, Assistant United States Attorney, counsel  
18 for the United States of America, and Rene L. Valladares, Federal Public Defender, and Navid  
19 Afshar, Assistant Federal Public Defender, counsel for Charles Winston James, that the  
20 Preliminary Hearing currently scheduled on December 28, 2021 at 4:00 pm, be vacated and  
21 continued to a date and time convenient to the Court, but no sooner than seventy-five (75) days.

22 This Stipulation is entered into for the following reasons:

23 1. Mr. James's Waiver of Indictment, Filing of an Information, Initial Appearance  
24 and Arraignment and Plea is currently scheduled for December 13, 2021. However, because  
25 Mr. James's case was reassigned to new counsel, this hearing will need to be continued to  
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1 permit counsel to have time to meet with Mr. James before going forward. The requested time  
2 is necessary to permit Mr. James to confer with new counsel and then enter his plea.

3 2. Mr. James is incarcerated and does not object to a continuance.

4 3. Additionally, denial of this request for a continuance could result in a  
5 miscarriage of justice.

6 This is the fourth request for continuance filed  
7 herein. DATED this 8<sup>th</sup> day of December 2021.

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9 RENE L. VALLADARES  
Federal Public Defender

CHRISTOPHER CHIOU  
Acting United States Attorney

10  
11 */s/ Navid Afshar*  
By \_\_\_\_\_  
12 NAVID AFSHAR  
13 Assistant Federal Public Defender

*/s/ Jared Grimmer*  
By \_\_\_\_\_  
JARED GRIMMER  
Assistant United States Attorney

1                                   **UNITED STATES DISTRICT COURT**  
2                                   **DISTRICT OF NEVADA**

3           UNITED STATES OF AMERICA,  
4                                   Plaintiff,  
5                                   v.  
6           CHARLES WINSTON JAMES,  
7                                   Defendant.  
8           \_\_\_\_\_

Case No. 2:21-MJ-0241-NJK  
**ORDER**

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10           Based on the Stipulation of counsel and good cause appearing,  
11           IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on  
12           December 28, 2021 at the hour of 4:00 p.m., be vacated and continued to March 15, 2022,  
13           at 4:00 p.m.  
14           DATED this 8th day of December, 2021.

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18                                   UNITED STATES MAGISTRATE JUDGE  
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